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7 Attorneys for Defendants, Counterclaimants, and
8 Third Party Plaintiffs PCJV USA, LLC, PCI
TRADING LLC, POTATO CORNER LA
9 GROUP, LLC, GK CAPITAL GROUP, LLC,
NKM CAPITAL GROUP, LLC and GUY
KOREN, and Defendants J & K AMERICANA,
10 LLC, J&K LAKEWOOD, LLC, J&K
OAKRIDGE, LLC, J&K VALLEY FAIR, LLC, J
11 & K ONTARIO, LLC, J&K PC TRUCKS, LLC,
HLK MILPITAS, LLC, and GK CERRITOS, LLC

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13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 SHAKEY'S PIZZA ASIA VENTURES,
16 INC, a Philippines corporation,

17 Plaintiff,

18 vs.

19 PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING , LLC, a
20 Delaware limited liability company; GUY
KOREN, an individual; POTATO CORNER
LA GROUP, LLC, a California limited
liability company; NKM CAPITAL GROUP,
22 LLC, a California limited liability company;
J & K AMERICANA, LLC, a California
limited liability company; J&K
LAKEWOOD, LLC, a California limited
liability company; J&K VALLEY FAIR,
LLC, a California limited liability company;
J & K ONTARIO, LLC, a California limited
liability company; HLK MILPITAS, LLC, a
California, limited liability company; GK
CERRITOS, LLC, a California, limited
liability company; J&K PC TRUCKS, LLC,
a California limited liability company; and,
GK CAPITAL GROUP, LLC, a California

Case No. 2:24-CV-04546-SB(AGRx)

Hon. Stanley Blumenfeld, Jr.

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16 **DECLARATION OF ARASH
BERAL RE: COMPLIANCE
WITH COURT ORDER, DKT. NO.
251**

17 Complaint Filed: May 31, 2024
18 Trial Date: August 18, 2025

1 limited liability company and DOES 1
2 through 100, inclusive,

3 Defendants.

4 PCJV USA, LLC, a Delaware limited
5 liability company; PCI TRADING LLC, a
6 Delaware limited liability company;
7 POTATO CORNER LA GROUP LLC, a
8 California limited liability company; GK
9 CAPITAL GROUP, LLC, a California
10 limited liability company; NKM CAPITAL
11 GROUP LLC, a California limited liability
12 company; and GUY KOREN, an individual,

13 Counter-Claimants,

14 v.

15 SHAKEY'S PIZZA ASIA VENTURES,
16 INC, a Philippines corporation,

17 Counter Defendant.

18 PCJV USA, LLC, a Delaware limited
19 liability company; PCI TRADING LLC, a
20 Delaware limited liability company;
21 POTATO CORNER LA GROUP LLC, a
22 California limited liability company; GK
23 CAPITAL GROUP, LLC, a California
24 limited liability company; NKM CAPITAL
25 GROUP LLC, a California limited liability
company; and GUY KOREN, an individual,

26 Third Party Plaintiffs,

27 v.

28 PC INTERNATIONAL PTE LTD., a
Singapore business entity; SPAVI
INTERNATIONAL USA, INC., a California
corporation; CINCO CORPORATION, a
Philippines corporation; and ROES 1 through
10, inclusive,

160850.00001/154448422v.1
25 Third Party Defendants.

1 **DECLARATION OF ARASH BERAL**

2 I, Arash Beral, declare as follows:

3 1. I am a partner at Blank Rome LLP, counsel of record for Defendants,
4 Counterclaimants, and Third Party Plaintiffs. I have personal knowledge of the facts
5 set forth in this declaration, and if called upon to testify under oath, I could and
6 would testify competently thereto.

7 2. In accordance with the Court's August 7, 2025 Order (Dkt. No. 251), I
8 am reporting to the Court that the parties promptly provided a copy of the Order to
9 Judge Stone.

10 I declare under penalty of perjury that the foregoing is true and correct.
11 Executed August 7, 2025, within the United States, its territories, possessions, or
12 commonwealths.

13 _____
14 */s/ Arash Beral*
15 Arash Beral
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CERTIFICATE OF SERVICE

The undersigned certifies that on August 7, 2025, the foregoing document was electronically filed with the Clerk of the Court for the United States District Court, Central District of California, using the Court's Electronic Case Filing (ECF) system. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.
Executed on August 7, 2025.

By: /s/AJ Cruickshank